

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

**RECEIVED**

OCT 14 2022

MB

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Jordan Jalil Curry

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

Cook County Department of  
Corrections, Cook County  
Department of Corrections Cermak,  
John Doe Doctor, Jane-  
Doe Nurse Individually and in  
their official capacities

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

Jordan Jalil Curry  
22-cv-5679  
Judge Edmond E. Chang  
Magistrate Judge Susan E. Cox  
PC 2  
RANDOM

**CHECK ONE ONLY:**

☒

**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)**

☐

**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)**

☐

**OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: N/A
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
- D. List all defendants: N/A
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): \_\_\_\_\_
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: N/A
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A
- I. Approximate date of disposition: N/A

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**I. Plaintiff(s):**

- A. Name: Jordan Jalpi Curry
- B. List all aliases: Jordan Allen
- C. Prisoner identification number: 201911181164
- D. Place of present confinement: Cook County department of Corrections
- E. Address: 2700 S CALIFORNIA AVE Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: John Doe  
Title: Doctor  
Place of Employment: Cook County Department of Corrections Drug Medical
- B. Defendant: Jane Doe  
Title: Nurse  
Place of Employment: Cook County Department of Corrections Drug Nurse
- C. Defendant: Cook County department of Corrections Cermak  
Title: Cermak Health Services  
Place of Employment: Cook County department of Corrections

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



2.5 Jordan Curry #20191118164

## Plaintiff

A. Name: Jordan Jolai Curry

B. List All aliases: Jordan Allen

C. Prisoner Identification Number: 20191118164

D. Place of Present Confinement: Cook County department of Corrections

E. Address: 2700 S California Ave Chicago IL 60608

## Defendant(s)

D

Defendant: Cook County department of Corrections

Title: Cook County department of Corrections

Place of Employment: Cook County department of Corrections

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

In the month of November 2020, I noticed dark "purple Psh Spots" as I would describe them forming on my left inner thigh, so I began dropping (Turning in) medical slips to see the doctor, I filled these forms out for weeks before I was finally seen by an DRV <sup>#1</sup> Nurse, I do not know her name but (She's An older Lady, talks with an accent, Brawnskin, Short hair in Afro style) I believe She's African or Jamaican. She asked me "Whats My medical concern, I quickly told her that "purple Psh spots" were forming on My left inner ~~thigh~~ thigh and they Itch and Hurt, She told me let her see, this Jane Doe DRV <sup>#1</sup> Nurse stood Approximately 9 feet away from me and took a quick look at the spots and handed me the Anti Itches Cream She Already Had in Her hand, She instructed me to Use the Anti-Itches Cream Every day After I Shower and let it Air Dry Before putting on my Doc pants, I followed Her instructions for two weeks with No sign's of the Spots Clearing up, so I filled out another medical slip to see the DRV <sup>#1</sup> Doctor After weeks of filling out medical forms and Complaining to SGTs and Nurses during med call, I was seen again by the Same Jane Doe DRV <sup>#1</sup> Nurse, I explained to her I did what She told me and there's No sign of the spots getting better, She look around in Her Medical Cart and Pulled out a Small tube of Hydrocortisone Cream, She tells me to Use it Everyday



After I shower and let it air dry before putting my pants on, again I did as I was instructed to do, and again nothing happened so I filed out another medical slip to see the Dr. 9 Doctor. They ran sick call every other day but I was never called, so I complained again to the nurses at sick call, to my Tice Officer's and the SGTs (white shirts) when they would make their rounds. Then I was seen by Dr. 9 Nurse Muhammad, I explained to her that these spots are spreading and they itch and burn and leak a clear puss sometimes. Dr. 9 Nurse Muhammad put her gloves on and took a look and put her gloves on and felt the spots. She told me that these spots are not a rash and she would put me in to see the Dr. 9 Doctor as soon as possible. As I went to see the Doctor the days turn to weeks and I was in constant ~~pain~~ <sup>discomfort</sup> daily. I would ask the nurse for pain pills and be denied ~~because~~ <sup>because</sup> I had to see the doctor before they could give me any pain medication during this waiting period to see the Dr. 9 Doctor these dark (purple-ish) spots started to spread and become larger and turn into something like a scab, so I began filling out medical health forms again. After being ignored again, I wrote a Detailed Inmate Grievance form on 07/21/21 explaining my health issue and my frustrations with Dr. 9 medical staff. After my grievance was filed a few days later I was seen by the ~~John Doe~~ Dr. 9 Doctor (Caucasian male, late 40's or early 50's, ~~has~~ <sup>wears</sup> glasses, dark colored hair with strings of grey). This John Doe Dr. 9 Doctor took a look at my thigh and then took the device from the wall that doctors use to look in people's ears and looked at the dark purple-ish colored

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Spots again, he placed the device back on the wall and said, Well I can tell you this is not a rash and I'm actually curious, to find out what this is, I said Well doc can you test me for Cancer and diabetes, they Run on both sides of my family and this have me worried John Doe Dr. a Doctor Replied No I'm not going to waste my time because I'm 100 percent sure that's not the problem But I'm going to order you a New Cream to try, lets see does this help before sending you out to "John H. Stroger, Jr. Hospital of Cook County" the Cream he ordered me is called (TREAMCINOLONE Acetonide Ointment USP, 0.1% Net Wt 15g PERREGO) This John Doe doctor told me if the Cream does not work, he would put me in to see A Skin doctor at John H. Stroger Jr. Hospital of Cook County, he instructed me to use the Cream Everyday after I shower and whenever I feel it dry, I did as I was instructed again Nothing happened so I began falling out more medical steps to see the Dr. - John Doe Doctor again This time he took another look and told me keep using the TREAMCINOLONE Acetonide Ointment, I did and then on 6/28/21 I wrote another Inmate Grievance form Explaining how I have been falling out Medical steps Since Nov 2020 About these dark colored (Purple ish) spots on my left inner thigh and I was told I would see A Doctor (Skin Doctor) at John H. Stroger Jr.

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Revised 9/2007

J CURRY #20191118169



Hospital of Cook County but the problem is that was months ago and I still haven't been by a professional at John H Stroger Jr Hospital of Cook County to find out what these spots are. I also state that since Dr. A Doctor (John Doe) or Nurses cannot figure out what these spots are and I'm still waiting to see someone I feel as my health is being jeopardized, because these spots could be skin cancer or something of that nature, I repeatedly filled out medical forms again and complained to the Nurses, and Whiteharts then again. On 8/19/21 I wrote another Grievance stating I have been falling out medical slips for almost a year about dark colored spots on my leg, I explained these spots bleed and puss comes out, they are hard and the Doctor and 2 Nurses agree it's not a rash and that I had an appointment scheduled for sometime in July 2021 but I was not transported or notified why I was not transported over to John H Stroger Jr Hospital. I also stated that the cream I was given does not work and I'm in pain every day and need help. A few days later on 8/26/21 7 to 3 Shift I was transported to John H Stroger Jr Hospital around 11 AM, I sat Blue Boxed and Shackled and Cold in the Bullpen in the Basement of the Hospital for hours before being told that my clinic was going to reschedule me, because they close in 30 minutes and they don't have anyone to take me up stairs to my clinic. I spoke with (Sgt Crook or Cook) "He said they only had 1 team to transport the 25 detainees they had scheduled that day to these clinics". He also states that he ~~sends~~ <sup>sends</sup> emails over to Gernak telling them they need to assign more people to transport



## Statement of Claim Page 8 J. Culey 20191118/64

Detainees to and from their clinics on time, and they still over  
 schedule detainees eachday without enough officers to transport them  
 up and down the stairs. So this results in a bunch of time wasted, I received a  
 response from Lt Lucas (Cermak) on 9/15/21 the response said "Ex-cops handles  
 being escorted to from and during visits to Stroger's (John H Stroger, Jr. Hospital of  
 Cook County) this request will be forwarded to them for further review. I respectfully  
 appealed and said "this keeps happening you guys are something to many detainees over  
 their without enough staff, my appeal was denied on 9/23/21 the reason states  
 "After 2nd review your unable to substantiate allegations however Exops Supt  
 will be advised of your grievance issue. My next appointment, I was actually  
 transported to the Dermatology Unit (4th floor) at John H Stroger, Jr. Hospital of Cook  
 County, A lady took a look at these dark colored spots then, took out a little tool that was  
 shaped like a tube, and quick pressed it on the longest and darkest spots and pressed down, the tool  
 took a sample of the spots, she filled the hole where the sample came from with foam and placed  
 an Band Aid over it, she told me that she was going to send the sample to the lab for  
 testing, she also took pictures and uploaded them to my medical file, she told me I  
 would have a appointment in a couple of weeks. A couple of weeks later on 10/22/21  
 I was transported back to the Dermatology ~~Unit~~ Unit, the lady who took the sample  
 along with a male doctor told me after looking closely they narrowed it down to a couple of  
 things but nothing makes sense but it being (Lichen Striatus), they said it could be  
 my skin is allergic to something in my environment or something I'm eating or a  
 medication I'm taking, I asked them to do a second test but I still haven't heard  
 anything, When I returned back to Cook County Cermak Div 8 that day, I was  
 seen by a black older female doctor, who I asked for a second opinion she told me I  
 would have to tell the doctor in my Div, When I was finally called to see John Doe  
 Div 9 Doctor again, I told him about my visit at Stroger's and asked him for a



## Statement of Claim PAGE 9 J. Curry 2019/11/18/2019

Referral to get another opinion, John Doe Dr. Doctor Stated "No you get your answer I will not be sending you back out wasting County money", I then stated I did not have these problems before coming to Dr. 9 and being stripped of my Cotton Blanket, He told me that He was Not sending me out and He Det 98 percent of Men in Cook County would ~~prefer~~ a Cotton Blanket over wool and that It's Not his Job to Get me A Cotton Blanket, I Explained to him what I was told and he told me Your Not Allergic to wool because I would be Allergic to my own skin. To this Date I have yet Got A Second opinion on these Dark (purplish) Spots on my thigh.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

monetary compensation two million dollars. better treatment (medical) for present and future detainees at CCDC. Simple basic rights and services for those detained. the right to be treated fairly and the right to get a second opinion by a different doctor, and to be treated (cared for) in a timely manner and an outside agency with place to hold CCDC accountable for all of their actions

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 7<sup>th</sup> day of October, 2022

Jordan Curry  
(Signature of plaintiff or plaintiffs)

Jordan Jalel Curry  
(Print name)

201911181164  
(I.D. Number)

2700 S. California Ave Chicago IL 60608  
(Address)





INSPECTED BY THE  
UNITED STATES  
MARSHALS SERVICE

INSPECTED BY THE  
UNITED STATES  
MARSHALS SERVICE

Prisoner Correspondent, United States  
District Court, 219 S. Dearborn Street 20<sup>th</sup> floor  
Chicago IL 60604



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